SBC Attch. A –
Performance
Measurements

The preparation of monthly performance measurement reports involves the collection of thousands of data points that are processed by the performance measure systems. As with any process that involves collection of data from multiple sources, corrections to a small percentage of the data points within the performance measurement systems is a necessary and routine business function. If SBC determines that there are any material errors in the data, SBC restates the data where feasible and appropriate, and discloses these restatements to the FCC staff via the cover letters transmitting its monthly performance results. In connection with the Ernst & Young LLP performance measurement attestation engagement, SBC has compiled a list of those items in the January - December 2001 performance measurement reports that were identified as having errors or where a measure's content could be made more precise. Restatements have been or will be provided where feasible and appropriate.

The items listed below were either identified and disclosed by SBC during its normal process of reviewing performance measurement reports or identified as part of the Ernst & Young attestation activity.

Issues Previously Reported for 2000 that Impacted 2001:

1. **Business Rule Exclusion Issue** (SWBT PMs 5c, 11c, 12c and 13c) – As noted in our prior year report, certain PMs permit an exclusion for those DSL loops greater than 12Kf with load coils, repeaters, and/or excessive bridged tap for which the CLEC has not authorized conditioning unless coded to the Central Office. Due to technical limitations, SWBT is unable to capture this information. Therefore, SWBT's reported results for this PM tend to overstate the actual percent trouble report rate in favor of the CLEC.

2. **Data Exclusion Issue** (SWBT PM 18) – As noted in prior years reports PM 18 reporting included only CRIS data (primarily resale activity). At the time the PM was implemented, resale was the predominant mode of entry, and therefore no provision was made for the inclusion of facilities and UNE charges, which are billed through the CABS system. During the six-month review process in Texas, it was recognized that CABS Billing Data Tape (BDT) data was not being captured for facilities and UNE charges. As a consequence, CLECs requested that SWBT expand the PM to include all electronic billing. SWBT concurred with this request and began enhanced reporting with February 2001 data reported in March 2001.

3. **LMOS Measurement Errors** (SWBT PMs 5a, 10a, 11a, 12a and 13a) – Certain POTS provisioning and maintenance PMs rely on LMOS (Loop Maintenance Operations System) in the processing of trouble reports on SWBT retail POTS (i.e., non-special services), and CLEC resale and UNE – P accounts. Some service orders for retail and resale conversions to UNE – P were not posting in the proper sequence to the LMOS database. The posting of these records potentially impacted CLEC's ability to open

electronic trouble reports on their customer's lines, as well as the accurate reporting of their PM data.

SWBT addressed this issue by implementing system enhancements designed to eliminate out-of-sequence posting of UNE – P service orders to the LMOS database. Also, effective May 11, 2001, SWBT corrected UNE – P records in the LMOS database identified as having sustained a sequencing error, and have continued this process twice a month since that time. Finally, SWBT has implemented a process designed to improve performance measurement reporting on tickets submitted manually at a time when the LMOS record has net yet updated. With these systems enhancements and procedural changes, CLECs can expect to open a higher percentage of their trouble tickets electronically, with a higher degree of accuracy in PM reporting.

4. **Prospective Change** (SWBT PM 3) – In early 2001, certain CLECs approached SWBT with a request that SWBT review its interpretation concerning PM 3 – Order Process Percent Flow Through (TPUC PM 13). The CLECs contended that UNE –P orders that are not MOG eligible should have been included in the calculation of the PM under the premise that if these orders had been submitted via resale they would have flowed through the SWBT EASE system. SWBT disagreed and countered that UNE – P orders are a very specific type of order unique to the wholesale environment and would not, in fact, flow through EASE.

The CLECs chose to bring this issue up at the six-month review of the Texas business rules conducted by the Texas Public Utilities Commission (TPUC). At those meetings, the TPUC was persuaded by the CLECs that UNE – P orders should be included under this measure. The TPUC ruled that SWBT should change the way it implements this PM to include UNE –P orders. SWBT agreed to change the way it calculates this PM to comply with this Order. SWBT began including UNE – P orders in its reporting for PM 13 in December 2001.

Because SWBT's reporting obligation to the FCC had already ceased by December 2001 and because SWBT does not believe this was ever an issue for FCC reporting SWBT did not restate historical FCC reports. SWBT did restate its state commission and CLEC reports for the period January 2000 through November 2001.

5. **Calculation Error** (SWBT PM 1) – Timestamp receipts recorded in the Service Order Retrieval and Distribution System (SORD) did not agree to supporting documentation for PM 1 - % Firm Order Confirmations Received Within "x" Hours. The receipt and transmittal timestamps recorded by Local Service Center (LSC) personnel are used to calculate the time interval between the receipt of an order and the transmission of a FOC. SWBT's policy is that LSC personnel should use the time stamp on the header on the fax received from the CLEC. However, in certain instances, this policy was not followed. Controls have been strengthened and SWBT has reinforced its policy by taking steps to inform its clerks and supervisory personnel of the correct procedure (i.e., using the actual receipt time directly off the fax header).

6. **Programming Error** (NB PM 1, 4d) - January through April 2001 were restated to correct a coding problem. The program code written to process orders from one interface "hard coded" the service center indicator which in turn identified all orders as originating in California. This had no material effect on Pacific Bell results and the correction has been validated by the independent auditor.

7. **Data Exclusion Error** (NB PM 2, PM 9) - During January through December 2001, one OSS for pre-order queries did not have the capability to distinguish between transactions originating in California from those originating in Nevada. All transactions defaulted to California. This had no impact on results since there was no CLEC activity on this interface in Nevada.

8. **Data Exclusion Error** (PB & NB PMs 4a, 4d, 5a, 6a) - For the months of January through March 2001, the FCC business requirements state that PIC and LPIC orders are to be excluded from the indicated measures. Due to the programming complexity, implementing these exclusions requiring a phased approach. Based on E&Y's prior year testing and representation by management, PM's 4a and 5a were improperly reported for January and February 2001. PM 4d was improperly reported for the period January through March 2001. PM 6a was improperly reported in January 2001. E&Y has tested management's changes implemented as of April 30, 2001 to ensure the fix put in place by management was effective in correcting the 2000 issue.

9. **Data Exclusion Error** (PB & NB PM 9) - January through April 2001 data was restated in August 2001 to correctly identify the start time as the time a request for loop qualification was received versus the time the request was entered to the system.

10. **Data Inclusion Issue** (SNET PM 8) – For January through March 2001, an exclusion was not taken for any transactions processed through the CRIS billing system that have a "customer requested due date beyond the offered interval" (the exclusion was in place for the CABS billing system). This was discovered while reviewing the code for Version 1.7 business rules implementation. There were no voluntary payments required for these months and the error favored the CLECs.

11. **Spreadsheet Error** (AIT DSL measures) – January through March 2001 were restated in May 2001 to remove regional ASI results, which had been substituted for the parity comparison in those months and states where there was no ASI activity.

2001 Performance Measurement Restatements, Prospective Changes and Other Data Issues:

1. **Data Error** (SWBT PMs 1 and 1.1) – May 2001 data was corrected and restated on July 20, 2001.

2. **Data Error** (SWBT PMs 1 and 6c) – January through July 2001 CLEC data and/or z-values were corrected for most submeasures. A new data file was provided to the FCC on September 14, 2001.

3. **FCC Reporting Error** (SWBT PM 2) – Z scores for January through March 2001 were restated in May 2001.

4. **Data Error** (SWBT PM 3) - January 2001 results were restated in March 2001.

5. **Data Error** (SWBT PM 3 (LEX and EDI only)) – June 2001 data was restated to exclude loop to loop conversion orders. These orders were erroneously included in the original submission. The impact of this restatement was primarily confined to one CLEC. A new data file was provided to the FCC on August 9, 2001.

6. **Data Error** (SWBT PM 3) - August 2001 ILEC results were restated in October 2001 due to an incorrect file that was used.

7. **Data Error** (SWBT PMs 4a and 6b) – Due to improper source data January 2001 results for two UNE Combo submeasures of PM 4a and 6b were restated in March 2001 for Arkansas, Kansas, Missouri and Oklahoma. A new data file was provided to the FCC on March 20, 2001.

8. **Data Error** (SWBT PMs 4a and 7a) – January through June 2001 data was restated to reflect certain programming code changes. A new data file was provided to the FCC on October 22, 2001.

9. **Data Error** (SWBT PMs 5a, 10a, 12a and 13a) – January through June 2001 data for these PMs was restated due to restatements of underlying Loop Maintenance Operations System (LMOS) data. New data files were provided to the FCC in August and September 2001.

10. **Data Error** (SWBT PMs 5a, 10a, 11a, 12a and 13a) – A restatement of July 2001 data to correct minor errors in manual adjustment entries. Also includes a restatement of the SWBT retail 8db loop disaggregation data of PMs 11c, 12c and 13c. A new data file was provided to the FCC on September 20, 2001.

11. **Data Error** (SWBT PM 5c) – January and February 2001 Z scores for Missouri were restated for 8 db loops in April 2001 to correct a data issue. Kansas results were impacted but not restated.

12. **Data Error** (SWBT PM 5c) – The data file submitted by SWBT on August 20, 2001, contained several errors and omissions (covering all 2001 calendar months from January through July). These were caused by FCC PM programming and data entry errors related to multiple conversions from one set of Business Rules to another. Specifically, SWBT converted several PMs from Version 1.6 to Version 1.7 for its

FCC reporting in August 2001. At the very same time, SWBT was converting PMs from Version 1.7 to Version 2.0 for state PM reporting. Specifically, for PM 5c the affiliate result was missing a value and restatements were provided in September 2001.

13. **Data Error** (SWBT PM 6a) – A restatement was made for PM 6a to correct the "no fieldwork" disaggregations for May 2001 data. A new data file was provided to the FCC on July 12, 2001.

14. **Data Error** (SWBT PM 6a) – June 2001 data for Missouri was restated to remove SWBT retail orders incorrectly assigned to a CLEC. The restatement did not affect the parity determination. A new data file was provided to the FCC on November 20, 2001.

15. **Data Error** (SWBT 6b) – January 2001 results were restated in March 2001 to correct a data error.

16. **Data Error** (SWBT PM 6c) – A restatement of January through April 2001 data for the Dark Fiber disaggregation to include additional orders (only affected 3 CLECs). This restatement only impacted the Missouri 1 – 10 circuits disaggregation (PM 6c – 10.1). A new data file was provided to the FCC on September 20, 2001.

17. **Data Reporting Change** (SWBT PM 7b) - There were 9 VGPL orders reported in MO for February 2001 with average delay days of 81.44. Upon review, it was found that seven of the orders were coded with a due date missed function code ("DDMFC") of 'I37', which indicates the installation was completed on time, however the completion was not recorded in WFA on time. Subsequent to this occurrence, it was decided orders carrying DDMFC of 'I37' would be considered 'completed on time' and counted as a made order. A coding change was made to the Specials measurements. The change was implemented in August 2001. By excluding these seven orders, the results would have been within the parity margins. The coding was changed prospectively and not restated.

18. **Data Error** (SWBT PM 7c) – February 2001 DSL linesharing results were restated in April 2001 due to a formatting issue associated with converting the state measure to the FCC format.

19. **Formatting Error** (SWBT PM 8) – January 2001 data was restated in March 2001 to correct a formatting error, which resulted in a submeasure not being reported (no line sharing) and the data for that submeasure being combined with another (DSL, no conditioning, line sharing).

20. **Data Error** (SWBT PMs 11b and 11c) – March 2001 results for DSL line sharing were restated in May 2001 in Missouri (CLEC and ILEC) and Arkansas (ILEC only).

21. **Data Error** (SWBT PMs 12b and 12c) – January through April 2001 results were restated on June 20, 2001.

22. **Data Error** (SWBT PM 12c) – Restated October 2001 data related to submeasure 12c – 08a to correct for a data loading error. A new data file was provided to the FCC on December 18, 2001.

23. **Data Error** (SWBT PM 16) – Restated February 2001 data for PM 16 to correct data errors. A new data file was provided to the FCC on April 5, 2001.

24. **Data Error** (SWBT PM 18) – SWBT restated the April 2001 numerator in June 2001 for one CLEC in Missouri. THE CLEC result and z-score changed for one submeasure.

25. **Data Extraction Errors** (Various SWBT PMs) – SWBT's FCC 20 reports contained minor errors for certain PMs due to such things as renumbering PM submeasures and reformatting DOJ reports based upon the Texas business rules and numbering scheme. For example, throughout 2001 SWBT converted its state reporting from Version 1.6 of the Texas business rules to Version 1.7. During this conversion process certain PMs required renumbering various submeasures, adding additional disaggregations, and in some cases adding additional columns of information to the DOJ reports. During the evaluation period, SWBT's method for developing its FCC 20 reports extracted data from the DOJ reports which must be converted to conform with FCC reporting requirements. During this process there were some errors made in referencing the correct location of information on the DOJ reports. In all cases, these errors were identified shortly after the reports were filed and were restated with the next reporting period.

The FCC 20 reporting errors described above had no adverse affect on the calculation of Tier 3 remedy payments to the Commission because those are calculated using the underlying raw data (i.e., the DOJ reports) and do not rely on the FCC 20 reports themselves.

26. **Class of Service Classification Errors** (SWBT UNE – P Maintenance PMs) Certain UNE - P maintenance tickets were found without a class of service indicator in the LMOS database. These unclassified tickets were erroneously defaulted to the "Residential" class of service for PM reporting. Beginning in June 2001, SWBT's Local Service Center organization began conducting a monthly study to determine the proper category for "unclassified" trouble tickets. The PM reporting organization receives data from the LSC and makes a manual adjustment to the ASKME data file to ensure PM reporting is correct.

27. **Clerical Error** (PB PM 1) - January 2001 results was restated in March 2001 to include data related to two CLEC's UNE Platform orders that were excluded in error. As part of the production process, an analyst runs data against an OCN table to assure all OCN's were valid. This restatement resulted from a clerical error where a prior month's OCN table that excluded two new CLECs was inadvertently used. This did

not impact Nevada Bell because those CLECs did not do business in Nevada. This process has since been automated.

28. **Clerical Error** (PB PM 1) - February 2001 was restated in April 2001 for the Electronically Received/Manually Handled UNE Dedicated Transport data element to more accurately reflect data entered through the EXACT interface.

29. **Data Exclusion Error** (NB PM 1) - May 2001 results for one submeasure (Projects) was restated in July 2001 to add one firm order confirmation for manually faxed projects for one CLEC and to express the result as a percentage of completed projects within 72 hours as required by the business rules.

30. **Implementation Issue** (NB PM 1) - June and July 2001 results were restated in October 2001 to change Simple Local Number Portability (LNP) and Complex LNP disaggregations into a combined Standalone LNP data element.

31. **Data Inclusion Error** (PB NB PM 1) - August 2001 results was restated in October 2001 to move enhanced extended loop (EEL) transactions from a project category to non-project reporting and to exclude some special access transactions.

32. **Clerical Error** (PB PM 1) - November 2001 data was restated in January 2002 for Resale residential POTS and Centrex submeasures to properly reflect certain exclusions that were omitted due to a manual error.

33. **Data Inclusion Error** (PB & NB PM 1) - December 2001 results were restated in May 2002 to correct the interval for some service requests and to add service requests presented through certain OSS systems.

34. **Data Validation Issue** (PB & NB PM 2) - CLEC and ILEC January 2001 data was reported in March 2001 for Verigate data elements due to a concern over transaction volumes detected in a review prior to posting. When original volumes were determined to be correct, they were published in March 2001.

35. **Data inclusion Error** (NB PM2) - June through November 2001 results were restated for nine wholesale data elements due to an error in translating the state results to the FCC results. This measure was also restated for the same period to populate analog data for the Mechanized Loop Qualification, Actual, EDI/CORBA data element.

36. **Data Exclusion Error** (PB & NB PM 2) - March 2001 results were restated in May 2001 in order to add Verigate transactions that were originally omitted as a result of investigation over possible duplicate carrier numbers. Valid OCNs are identified by the IS Call Center each month which in turn provides them to the Performance Measures Organization (PMO) to apply to the measure. The IS Call Center was investigating 2 OCNs which appeared to be duplicated and had removed them from the valid OCN list.

The PMO used the OCN file from the call center. When the PMO checked with the call center, they discovered the OCNs were actually valid and restated the measure.

37. **Programming Error** (PB PM 2) - April 2001 results were not reported until June 2001 report Datagate and Verigate data elements due to the fact that a review of the data prior to posting identified issues that were not able to be corrected in time for posting with April data.

38. **Data Inclusion Error** (PB PM 2) - April 2001 results were restated in October 2001 in order to remove data for a wireless company that was improperly included in the aggregate CLEC results. A wireless OCN was mistakenly included in the population due to a one time, isolated error.

39. **Implementation Issue** (NB PM 2) - May 2001 results were delayed until July 2001 to properly report certain submeasures as parity versus benchmark measurements associated with the adoption of the new business rules. These submeasures were originally programmed as a benchmark measure of averages. This measure is actually a parity measure so the parity and benchmark fields were displayed as null. The format indicator was subsequently corrected causing the retail data to be displayed and compared appropriately.

40. **Clerical Error** (NB PM 2) - June and July 2001 results were restated in September 2001 to provide Z-scores previously omitted.

41. **Data Inclusion Error** (NB PM 2) - Results for EDI/CORBA telephone number queries were not published from October through December 2001 in NB since the only CLEC making requests was using an OCN that is only valid in California.

42. **Programming Error** (PB & NB PM 3) - March 2001 results were posted in May 2001 as a result of programming issues associated with CLEC to CLEC migrations. This type of transaction requires two service orders. When results were processed, the OCN's on both orders were captured, however, the assignment of results was not always the originating CLEC. The programming change had no impact on the percent of flow through in aggregate, so there is no impact to FCC PMs.

43. **Clerical Error** (NB PM 4c, PM 6c) - August 2001 results were restated November 2001 to add transactions for one CLEC for the EELs DS1 data elements that was improperly excluded due to a clerical error.

44. **Programming Error** (NB PM 4d) - January through March 2001 results were restated in September and October 2001 to correct the result for the LEX/CLEO/EDI data element. January 2001 was also modified to correct a programming logic problem that affected the time interval calculation for CLEO data. The correction of the time calculation changed the results from a miss to a hit for one CLEC. The CLEC had four

orders and all four were completed within the 24hr interval. All other corrections for the other months had no impact on the hit/miss outcome of the measure.

45. **Data Exclusion Error** (PB PM 4d) - February 2001 results were restated in April 2001 to correct an underreporting of completions associated with a recently implemented EXACT system. This was an isolated incident where during development of the measurement, the analyst used an interim file to post results.

46. **Implementation Issue** (NB PM 4d) - May 2001 was restated in July 2001 to report the number of completions within the benchmark interval rather than the average time for a completion notice for some of the data elements. When the new business rules were implemented, an error was introduced in which fields were being picked up by the measurement posting system.

47. **Clerical Error** (PB PM 4d) - June 2001 results were restated in September 2001 in order to correct one submeasure (% within 24 hrs CESAR) for three orders that were mistakenly coded as exceeding the 24 hour target due to a manual error. Even though the transactions moved from a fail to a pass, the change did not impact the overall measurement.

48. **Clerical Error** (PB PM 5a, 5b, 5c) - February 2001 results were restated in April 2001 for UNE Loops and Retail Business and Residence POTS resulting in a small improvement in results for those data elements. The adjustment was necessary because of a manual error during the process of filtering data.

49. **Implementation Issue** (NB PM 5a, 5c) - June and July 2001 results for two submeasures were delayed until November 2001 in order to take some exclusions and properly classify some orders previously reported inappropriately due to incorrect programming logic. These measures changed with the new business rules and did not begin until June 2001. Programming had to be adjusted to change from the original 30 day interval to a 10 day interval. Manual processes were put in place on an interim basis. PB results were posted correctly but the NB data had to be rerun once the program was fixed.

50. **Clerical Error in Business Rules** (PB PM 5a, 5c, 8) -The business rules submitted to the FCC for approval indicated that PM 5a and 5c are to be disaggregated by region. The business rule for PM 8 specifies that results are to be reported at the state level. These requirements are scrivener's errors that occurred when the documents were prepared. Results were for PM 5a and 5c are being reported on a statewide level and results for PM 8 are being reported by region within California. When these measures were programmed, the code requirements were driven by the CPUC Joint Partial Settlement Agreement (JPSA). The FCC measures are mapped to the JPSA results and are therefore consistent with the CPUC order that is underlies the FCC measures.

51. **Implementation Issue** (PB & NB PM 5b) - ILEC results for NB for June and July 2001 were restated in September 2001 and PB July results were restated in October to correct datapoint identification for two submeasures. Since there was no CLEC activity on these submeasures, only the ILEC data was restated.

52. **Data Source Error** (PB PM 5c) - April 2001 results were restated in June 2001 in order to report UNE Loop trouble tickets in the correct geographic area. During the data validation process, PB determined that the geographic identifier on a subset of trouble reports was not properly mapped to region. State level results were correct but the performance results by region was being made to appear worse that it actually was. A new process was implemented to derive region based upon characters in the circuit string.

53. **Data Exclusion Error** (PB PM 5c, 10b, 11c, 12c, 13c) - April and May 2001 results were restated in September 2001 in order to include a small number of additional trouble tickets for UNE Platform service that were previously not reported.

54. **Programming Error** (NB PM 7a, 7c) - May 2001 results were restated July 2001 in order to correct results due to a programming error. A problem was identified with the source files for May 2001 results. Even though the problem was detected and immediately corrected, only the files for PB could be corrected in time for the monthly filing.

55. **Data Exclusion Error** (NB PM 9) - January 2001 results were restated in March 2001 to correct one transaction that was omitted in error from the results. This data point was restated due to correct the numerator for one disaggregation for one transaction. Due to the immateriality of the restatement, this was not noted in the transmittal letter.

56. **Disaggregation Error** (PB & NB PM 9) - January through September 2001 results were restated in November 2001 to combine two different data elements that should have only appeared as one element. January through April 2001 was restated in August 2001 to correctly identify the start time as the time a request for loop qualification was received versus the time the request was entered into the system.

57. **Programming and Clerical Error** (PB PM 10b, 13c) - February 2001 results were restated April 2001 in order to remove wireless data that was improperly included in the CLEC aggregate results due to a programming error and to correct one CLEC's results for improperly reported interconnection trunk elements due to a clerical error. The exclusion of wireless carriers is now automated in the reporting systems and there is now a pre-posting review of manual results to validate monthly information.

58. **Reporting Error** (PB PM 11c) - January 2001 results were restated in March 2001 to correct an over reporting of repeat troubles due to a manual error and to populate data elements that were previously omitted in error. Correction was required for wholesale 8db, 5.5 db, line sharing and xDSL loops and to populate UNE platform data elements

that were previously omitted in error. May 2001 results were restated in July 2001 in order to correct a subset of trouble tickets for UNE Loops that were incorrectly classified. The latter process has since been mechanized.

59. **Programming Error** (PB & NB PM 11c) - September through December 2001 data was restated in May 2002 to correct a logic issue that caused repeat trouble reports to be overstated for unbundled loop and line sharing data elements. In addition, the September 2001 data elements were restated in May 2002 to correct a small change in the analog data against which they are compared.

60. **Clerical Error** (PB PM 11c) - October 2001 results were restated in December 2001 related to an error with the counting of trouble reports associated with the broadband line sharing disaggregation. The errors involved UNE Loop 2 wire Digital xDSL Broadband Line sharing PB Voice and CLEC Data for parity. A manual workaround was being used to duplicate the Broadband Line Sharing items for report to the FCC. While reviewing the data, it was discovered that a clerical error occurred and 128 troubles were not duplicated. This has been corrected since November data and the process is now done electronically.

61. **Data Inclusion Error** (PB PM 11c) A valid exclusion was not taken for both retail and wholesale data for the months on May – December 2001. As parity was not impacted, PB did not restate results.

62. **Clerical Error** (PB PM 12c) - January 2001 was restated in April 2001 to correct the LNP data element for two CLECs that had been populated with incomplete data due to a clerical error. This isolated error did not impact any other measures or any other months.

63. **Clerical Error** (PB & NB PM 12c) - December 2001 results for the UNE level of disaggregation was restated in April 2002 to correct a data transposition error for one CLEC.

64. **Reporting Error** (NB PM13c) - June 2001 results was restated in October 2001 to correct the line count for UNE Loop 4-wire Digital 1.544 mbps capable HDSL data element for one CLEC.

65. **Data Exclusion Error** (NB PM 13c) - September 2001 results was restated in December 2001 to add the appropriate analog data for one level of disaggregation (UNE Platform ISDN PRI Port with Loop) that was incorrectly reported as NA. There was no wholesale data for this data element. The Company elected to not restate the measure since there was no CLEC activity to report for the month and this is a parity measure.

66. **Reporting Error** (NB PM 13c) - August 2001 results were restated in December 2001 for two submeasures were not reported in the file sent to the FCC.

67. **Reporting Error** (PB 13c) - July through December 2001 results were restated in June 2002 for analogs to UNE Loop data elements in order to disaggregate by dispatch and non-dispatch categories.

68. **Clerical Error** (NB PM 16) - May results were not posted until July 2001 due to a clerical error that occurred during processing of this measure.

69. **Data Exclusion Error** (PB PM 17) - Collocation transactions were improperly excluded from the denominator of the month of May 2001 due to PB's criteria associated with the exclusion of new CLECs that do not have an active billing account and are not processing transactions. Results were not restated as there were no missed due dates. The policy for PB/NB to publish data for CLECs is that the CLEC must be actively conducting business in California and/or Nevada. Conducting business is defined as having a valid CLEC profile that is passing orders or receiving a CABs or CRIS bill within the last 12 months. The valid CLEC profile must state the OCNs and ACNAs that the CLEC will use within the state.

70. **Clerical Error** (PB PM 17) - Virtual collocation transactions were not broken out into their own level of disaggregation as required by the business rules. The denominators were incorrect until April 2002, when PB began properly reporting on these disaggregations. Results were not restated as there were no missed due dates; therefore, had no impact to the results had the disaggregations been broken out.

71. **Clerical Errors** (SNET PM 1) – Entry of response times related to facsimile orders manually entered by service reps into the reporting system omitted some relevant data which resulted in improperly calculated time intervals. During the evaluation period, there were 7 instances where clerical errors occurred in date fields and were not detected. Methods and procedures emphasizing the review and validation of critical information have been reinforced with the service representatives.

72. **Implementation Issue** (SNET PM 1) – June through October 2001 data was restated in January 2002 to correct a program coding error that incorrectly excluded "projects" (i.e., FOCs associated with "projects") from reported results for manually submitted firm order confirmations. This was due to a change in the business rules from Version 1.5 to 1.7 requiring the inclusion of projects. SNET discovered the change during the Version 2.0 implementation code review and corrected the code effective for the reporting of November 2001 data.

73. **Source Data Error** (SNET PM1) – June and July 2001 local number portability (LNP) orders from one OSS system were not appropriately identified (the MSAP LNP flag was not being set properly) resulting in the misstatement of four sub-measures. This was corrected with August, 2001 results. Although data could not be retrieved to restate June and July, there was no change in the voluntary payments made.

74. **Implementation Issue** (SNET PMs 1, 1.1, 16) – The line counts utilized by SNET to identify various levels of disaggregation for certain order types followed the SNET CLEC Guide. The FCC's guidance, in December 2001, directed SNET to use the criteria approved by the Texas PUC rather than make adaptations that would be required to reflect local practices. Therefore, effective with Version 2.0 business rules and January 2002 reporting, SNET's business rules were matched to the Texas levels of disaggregation. This had no impact on SNET's 2001 voluntary payments for PMs 1 and 1.1 under Version 1.7, and PM 16 was "diagnostic" under 1.7 (no voluntary payments applied).

75. **Implementation Issue** (SNET PM 1) – June 2001 z-test results were restated in August 2001 for two sub-measures implemented with Version 1.7 business rules. The table designation to compute a z-test on these data points was activated in error and subsequently was corrected. This did not change reported CLEC results or benchmarks, impact voluntary payments or impact pass/fail of the sub-measures.

76. **Implementation Issue** (SNET PM 2) – January 2001 and the prior year results for two sub-measures were restated in March 2001 due to improper inclusion of detailed CSR queries instead of disaggregations for summary requests as stipulated in Version 1.5 business rules. Results for CSR detailed queries were published beginning with June 2001 results with implementation of Version 1.7 business rules.

77. **Data Transmission Issue** (SNET PM 2) – In January and March 2001, data from an OSS source system and in December 2001 data from another OSS source system was not passed to the PM reporting system for three isolated days resulting in the omission of the data from the results. Results were restated in December 2001 and February 2002, respectively. A new process was put in place for each source system to prevent a reoccurrence of this issue. There was no impact on the PM pass/fail or the voluntary payment computation.

78. **Data Inclusion Error** (SNET PM 3) - January 2001 results for two data points were misstated due to a programming error that incorrectly included orders that were not flow through eligible. This error benefited the CLECs, therefore, SNET chose not to restate. SNET was not liable for voluntary payments in January 2001 per the FCC merger conditions.

79. **Process Improvement Issue** (SNET PMs 4a, 5a, 6a, 7a) – January through April results were restated in June 2001 to reflect SNET's initiative in instituting a process improvement to better match posted orders with completed service orders, thereby more accurately identifying orders that are posted in a given month.

80. **Data Exclusion Error** (SNET PM 4c, 6c, 7c) – January through November 2001 results for two data points incorrectly excluded Non-Design 8db UNE loops from both the numerator and denominator of the measure. The results were restated in February 2002 to add Non-Design 8db loop orders.

81. **Data Transmission Error** (SNET PM 4c) – The February 2001 results for one data point were restated in February 2002 to correct a manually caused data transfer error (the file that initially reported February data did not agree with the detail data). This process is now mechanized.

82. **Data Exclusion Error** (SNET PMs 4c, 5c, 6c, 7c, 8) – September through November 2001 were restated in January 2002 to include additional UNE DSL Loop Line Sharing service orders. Previously these orders were excluded from reporting due to a program coding error introduced in September, which was detected later during the code review for Version 2.0 business rules implementation.

83. **Data Exclusion Issue** (SNET PMs 5c, 11c, 12c, 13c) – For June through December 2001, two exclusions could not be taken due to system limitations. The first was for trouble reports on DSL loops greater than 12K feet in length with load coils, repeaters and/or excessive bridge tap for which the CLEC had not authorized conditioning unless coded to the central office. The second was for trouble reports caused by lack of digital test capabilities on 2-wire BRI and IDSL capable loops where acceptance testing is available but not selected by the CLEC. The effect of not taking these exclusions was to the CLEC's benefit.

84. **Implementation Issue** (SNET PM 5c) – June through September 2001 results were restated in May 2002 to correct the parity comparison for Non-Design 8db UNE loops from retail residence and business fieldwork to retail business fieldwork and no fieldwork. This restatement did not impact the pass/fail for any month.

85. **Implementation Issue** (SNET PM 6a) – January and February 2001 results were restated in April 2001 for two sub-measures to properly exclude orders with requested due dates greater than one business day. These same results, as well as results from March and April 2001, were restated in June 2001 to properly count all orders with Company offered due dates. The restatements reflected a code change made to more closely comply with the business rules.

86. **Data Exclusion Error** (SNET PM 6a) – January 2001 results for two data points were restated in June 2002 to include some orders with Company offered due dates that were previously omitted from the results.

87. **Data Exclusion Error** (SNET PM 6b) – April and May 2001 results were incorrect due to SNET not taking an allowable exclusion for customer caused misses. SNET intends to restate the results prospectively. Not taking the exclusion had no impact on pass/fail of the measure.

88. **Data Exclusion Error** (SNET PM 6c) – January through April 2001 data was restated in June 2001 to include an exception stated in the business rules (customer requested

due dates greater than x business days). SNET discovered this during a code review when Version 1.7 business rules was being implemented.

89. **Data Processing Error** (SNET PM 7c) – April 2001 data was restated in June 2001 to reflect service order level data for 8db loops instead of circuit level data. In April, the wrong file (circuit level) was applied due to a processing error.

90. **Source Data Error** (SNET PM 9) – January through June 2001 results did not capture loop qualification requests made by the SNET reps on behalf of CLECs as CLEC transactions. Significant modifications to the W-CIWIN offered interface had to be made in order to capture the data as required by the measurement. The changes required were implemented with the June 25, 2001 W-CIWIN version release. July 2001 results first reflected this enhancement. There was no voluntary payment impact over this period due to the error.

91. **Publication Issue** (SNET PM 9) – ILEC results for January 2001 were restated in April 2001. This reflects a process change to print ILEC or Affiliate values even though there was no CLEC activity.

92. **Manual Processing Error** (SNET PMs 11c, 13c) – January and February 2001 data was restated in April 2001 because it was discovered during the monthly data validation process that some data points were not being reported that in fact had data. This was due to the data point identification in DSS having not been activated for the period. Once the data points were activated, the data appeared on all reports.

93. **Calculation Error** (SNET PM 13b) – January through May 2001 results for three levels of disaggregation, and April and May results for another, were restated in February 2002 due to various calculation issues associated with the denominator of the sub-measure.

94. **Source Data Error** (SNET PM 13c) – August through October 2001 data was restated in December 2001 to correct the access line count associated with DSL circuits due to an inadvertent elimination of the CLEC identifier (AECN) in the WFA source system for some circuits. This was corrected in the source system and the results were rerun.

95. **Data Exclusion Error** (SNET PM 13c) – January through June 2001 results for one sub-measure were restated in June 2002 to include additional access line circuit counts for CLECs with zero Trouble counts. This error favored the CLECs.

96. **Source Data Error** (SNET PM 13c) – August 2001 data for one sub-measure was incorrectly reported in the file sent to the FCC but was properly reflected on the CLEC web site. This error was in favor of the CLECs. The result was restated in December 2001.

97. **Data Exclusion Issue** (SNET PM 15) – For March through December 2001, SNET mistakenly excluded certain calls from the denominator of the calculation causing SNET's service to look slightly worse than it was (i.e., the error favored the CLECs). The process causing this has been corrected and results were restated in May 2002. There was no voluntary payment impact.

98. **Data Transmission Issue** (SNET PM15) – Approximately 80% of the data normally collected for one sub-measure for a 20 day period in June 2001 was available. The missing data on high blockage was non-retrievable and results were therefore not restated. However, there was no voluntary payment impact as the measure passed the two months proceeding June 2001 and the two months after.

99. **Manual Processing Error** (SNET PM16) – For April 2001, SNET excluded three coordinated hot cuts (CHCs) from the measure. These orders were improperly identified as having no or unidentifiable AECNs due to clerical errors and should have been included in the aggregate results. These errors in April reflect a totally manual process (under the Version 1.5 business rules) with inherent flaws present at that time. Impacted personnel were informed of the importance of accurately recording CHC data on orders. The omission of the three orders had no impact on the pass/fail for the measure and there was no voluntary payment impact.

100. **Disaggregation and Source Data Errors** (AIT PM 1) – April 2001 was restated in July 2001 to combine the LNSP and LNP with loop into a single LNP with loop category. February 2001 results were restated in November 2001 for several levels of disaggregation related to PM 1.1 (DSL measures) to further delineate xDSL into broadband and non-broadband disaggregations. February through October 2001 results were restated in March 2002 to correct a variety of data issues.

101. **System Limitation** (AIT PM 1) – For the months of July through December 2001, Ameritech did not have the system capability of tracking firm order confirmations on projects against the negotiated due dates.

102. **Publication Modification** (AIT PMs 1.1, 2, 8, 12b, 12c, 13b, and 17) – April 2001 forward was restated in March 2002 to publish results where there was no activity by the CLEC but some activity by the advanced services affiliate.

103. **Data Inclusion and Disaggregation Errors** (AIT PM 2) – June through December 2001 was restated in May 2002 for the Customer Service Record – Verigate disaggregation to include records greater than 13 kilofeet in the base. June 2001 through March 2002 were restated in June 2002 to include Verigate LSOG4 results. For one front-end ordering system, transactions during 2001 could not be disaggregated by state, and as such, the Company reported these results at a regional level.

104. **Disaggregation and Data Exclusion Error** (AIT PM 3) –January 2001 results for one data point (UNE Loops) were restated in March 2001 to remove reject orders from the

measure as required by the business rules. March 2001 results were restated in May to provide the CPO disaggregation, which was inadvertently omitted from published results. The UNE Loop disaggregation for May 2001 was restated in July 2001 to remove orders for LNP with Loop which are not designed to flow through Results for August through December, 2001 did not include resale projects via EDI and will be restated prospectively. January through July 2001 will be restated if there are material CLEC volumes.

105. **Programming Code Error** (PM 3) – April 2001 was restated in July 2001 to correct the code for the data processing output run from the MOR system.

106. **Data Inclusion Error** (AIT PMs 4a, 4b, 4c) – March 2001 was restated in May 2001 to appropriately capture cancels in the disaggregations.

107. **Source Input Errors** (AIT PMs 4a, 4b, 4c, 5a, 5b, 5c, 6a, 6b, 6c, 7a, 7b, 7c) – For Illinois only, PMs 4a, 4b, 4c, 6a, 6b, 6c, 7a, 7b, 7c for June 2001 were restated to correct for previously incomplete source files. Also, for Illinois only, PMs 4a, 4b, 4c, 5a, 5b, 5c, 6a, 6b, 6c, 7a, 7b, 7c for April and May 2001 were restated in November 2001 to correct for a processing delay which caused some orders from the end of April to incorrectly post to May results. August 2001 PMs 4a, 4b, 4c, 5a, 5b, 5c, 6a, 6b, 6c, 7a, 7b, 7c for Wisconsin only were restated in November 2001 when it was determined that some installs had been omitted.

108. **Data Processing Corrections** (AIT PMs 4a, 4b, 4c, 6a, 6b, 6c, 7a, 7b, 7c, and 8) – April 2001 results were restated in August 2002 to reverse an RRS processing issue which incorrectly identified a number of POTS install records as being duplicates. January, March and June 2001 were also affected and change requests for restatements are active but have not been scheduled. For Illinois only, May 2001 was restated in May 2002 to correct a processing problem in RRS that caused a truncation of monthly files for POTS installations.

109. **Data Processing Correction** (AIT PMs 4a, 4b, 4c, 6a, 6b, 7a, 7b, and 7c) – October 2001 was restated in March 2002 to correct a data processing error that affected POTS installation results.

110. **Programming Error** (AIT PMs 4a, 4b, 5a, 5b, 6a, 6b, 7a and 7b) – July through September 2001 results were understated due to a number of transactions for UNE-P Business which did not pass from an upstream system to the reporting system. Restatements for August and September are scheduled for November 2001, the July restatement is pending.

111. **Data Exclusion Error** (AIT PMs 4a, 4b, 5a, 5b, 6a, 6b, 7b, 11a, 11c, 12a, 12c, 13a, and 13c) – December 2001 results were misstated due to certain UNE-P transactions being classified as retail transactions.

112. **Data Inclusion Error** (AIT PMs 4b, 4c, 5b, 5c, 6b, 7b, and 7c) – March through September 2001 were restated in February 2002 to exclude certain ISDN-PRI circuits which were being double counted.

113. **Source Data Error** (AIT PMs 4b, 4c, 5b, 5c, 6b, 6c, 7b, 7c, 11b, 11c 12b, 12c, 13b, and 13c) – August through September results were restated in February 2002 to include two newly created service centers.

114. **Data Inclusion Error** (AIT PM 4b, 5b, 6b, 7b, 11b, 12b and 13b) – October 2001 results were restated in March 2002 to include UNE Loop and UNE Port for ISDN-PRI data.

115. **Data Error** (AIT PMs 4b, 4c, 5b, 5c, 6b, 6c, 7b, 7c, 8, 10b, 11b, 11c, 12b, 12c, 13b, and 13c) – August 2001 results forward did not include products that were misclassified to an "unknown" category. These submeasures will be restated prospectively.

116. **Parity Comparison Error** (AIT PM s 4b, 6b, 6c.1, 7b, 10a, 11b, 12b, and 13b) – During 2001, results for voice grade private line counted all circuits on the T1, rather than count the T1 as a single pipe, when comparing VGPL services to wholesale DS1 services.

117. **Disaggregation Error** (AIT PMs 4c, 1, 6c and 8) – July through September 2001 were restated in November 2001 to reflect LSC process improvements in their ability to track orders with unsolicited FOCs.

118. **Process Improvements** (AIT PM 4c) – March and April 2001 were restated in June 2001 to include a DSL line sharing disaggregation that had been omitted due a missing tracking number. June through August 2001 was restated in October 2001 to reflect an enhancement in the criteria that indicate when a due date change was for a customer reason.

119. **Data Error** (AIT PM 4c, 5c, 7c, 8, 11b, 11c, 12b, 12c, 13b, 13c) – Various ISDN and DSL submeasures during 2001 were restated in April 2002 to include ILEC results.

120. **Implementation Error** (AIT PMs 4c and 7c) – March through May 2001 results for UNE 8.0 dB data points were improperly reported under the 1.7 business rules which caused a variation in the levels of disaggregation.

121. **Business Rule Implementation** (AIT PMs 4c, 5c, 7c) – July through October 2001 was restated in December 2001 to correct the retail equivalent for 8 dB loops at the item or line level.

122. **Programming Error** (AIT PMs 4c, 5c, 6c, 7c, 8, 11c) – December 2001 through February 2002 was restated in April and July 2002 to implement revised logic for

capturing service order number sequences associated with Broadband Line Share orders.

123. **Data Processing Error** (AIT PMs 4c, 5c, 6c, 6c.1, 7c, 10b, 11c, 12c and 13c) – November and December 2001 results for certain DSL transactions were improperly classified as 8dB loop transactions.

124. **Data Processing Error** (AIT PMs 4c, 5c, 6c, 7c, 8, 10b, 11c, 12c and 13c) – Results for 2001 did not properly classify certain transactions as DSL orders.

125. **Disaggregation and Data Exclusion Errors** (AIT PM 4d) – March and April 2001 were restated in July 2001 to include UNE Combo in the results. January and February were not restated. During the evaluation period, results did not include stand-alone LNP orders.

126. **Data Exclusion Error** (AIT PMs 5a and 5c) – June 2001 results for Illinois were restated in November 2001 to correct for an incomplete source file.

127. **Data Errors** (AIT PM5b) – ILEC results for January through April 2001 were restated to correct previously reported results for one data point (Resold Specials – ISDN).

128. **Data Error** (AIT PMs 5b and 5c) - September 2001 was restated in November 2001 to incorporate changes in the numerator selection criteria used to select trouble reports and identify PTRs.

129. **Parity Comparison Errors** (AIT PM 5c) – April 2001 results were restated in July 2001 to properly show the retail comparison for 8 dB loops. April through August 2001 were restated in October 2001 to include POTS – ISDN records.

130. **Business Rule Implementation** (PMs 5c, 11c, 12c and 13c) – Exclusions related to DSL loops greater than 12 kilofeet in length and for trouble reports where acceptance testing is available but not selected by the customer could not be taken due to limitations within existing systems. Not taking these exclusions benefited the CLECs.

131. **Coding Error** (AIT PM 6a) - March 2001 results were restated in May 2001 and January, February and April 2001 results were restated in July 2001 to correct a coding error to properly remove non-fielded wholesale orders with due dates beyond the next day.

132. **Data Processing Problem** (AIT PMs 6a, 6b, 6c, 6c.1 and 8) – Due to data processing problems encountered during a system upgrade, results for some submeasures were not available for inclusion in the Excel file transmitted to the FCC Staff on January 22, 2002. Results were posted to the web site on time and the corrected spreadsheet was filed two days later.

133. **Data Exclusion Error** (AIT PMs 5c, 6b, 6c, 8 and 9) – For various submeasures results for some months between January and May 2001, results were restated in June or July 2001 (depending on the specific submeasure) to adjust results for the proper treatment of holidays.

134. **Business Rule Implementation** (AIT PM 6b) – July 2001 results for Illinois, Michigan, Ohio and Wisconsin and September 2001 for Ohio were restated in November 2001 to report wholesale ISDN-PRI as a single pipe rather than as 23 channels, permitting a better comparison with retail results for DS1.

135. **Data Categorization and Disaggregation Error** (AIT PMs 6c and 8) – April 2001 results were restated in July 2001 to correct the measured due date on orders where the due date preceded the order receipt date. July results for AIT PM 6c (v1.7) and AIT PM 8 were restated in October 2001 to reflect an improved way of identifying conditioning for DSL – No Line Share. PM 6c (v1.7) was also restated for July 2001 in October 2001 to include the disaggregation for DSL – Line Share.

136. **Business Rule Implementation** (AIT PM 6c and 6c v1.7) – June through August 2001 was restated in October 2001 to properly reflect the version 1.7 business rules.

137. **Business Rule Implementation Error** (AIT PM 6c) – April and May 2001 results were restated in July 2001 to reflect the use of "Order Level Circuit Count" instead of "Item Count" in the criteria. January through March results were corrected in February 2002.

138. **Programming Error** (AIT PMs 6c and 8) – Results for October through December 2001 did not correctly identify conditioned and non-conditioned DSL orders.

139. **Data Inclusion Error** (AIT PM 7c) – January through April 2001 were restated in July 2001 to include facility misses. April, May, October and November 2001 were restated in May 2002 to include misses due to facility reasons.

140. **Data Inclusion Error** (AIT PM 8) – October through December 2001 was restated in March 2002 to correct the way facilities modifications are counted for no line share conditioned/non-conditioned loops. During 2001 system limitations precluded excluding expedited orders from the measure. These results also did not exclude orders with CLEC requested due dates greater than the offered interval, thus benefiting the CLECs. During the evaluation period, the installation interval on orders for line sharing was inflated by the time required to pre-qualify the loop, thus benefiting the CLECs.

141. **Data Error** (AIT PM 8) – January through June 2001 results were restated in September 2001 and July 2001 was restated in October 2001 to reflect the proper classification of conditioning for the DSL without line sharing submeasure.

142. **Data Exclusion Issue** (AIT PMs 10b and 12c) – Permitted exclusions to remove no access or delayed maintenance time were not taken during 2001 from these measures for tickets processed by LMOS.

143. **Publication Error** (AIT PMs 10b, 12c and 13c) – March through May 2001 were restated in July 2001 to properly show the POTS retail equivalent for 8 dB loops. The February through May 2001 restatements for 12c and 13c were subsequently reversed in the same month.

144. **Business Rule Implementation Error** (AIT PMs 12c and 13c) – August 2001 was restated in October 2001 to properly reflect the version 1.7 business rules. October 2001 results were initially published in November 2001 for the DSL Line Share and No Line Share disaggregations. August and September 2001 results were also provided at that time for informational purposes.

145. **Disaggregation Errors** (AIT PM 12c and 13c) – August 2001 through December 2001 was restated in March 2002 to include dispatch and no dispatch disaggregations.

146. **Data Inclusion and Calculation Errors** (AIT PM 13a) – January through April 2001 were restated in July 2001 to include UNE -Combo – Residence which had been inadvertently omitted. August 2001 was restated in October 2001 to correct a line count in the denominator. September 2001 was restated in November 2001 to correct the UNE-Combo Residence and Business disaggregations.

147. **Input Errors** (AIT PM 15) – April 2001 results were restated in December 2001 to correct input errors in Illinois and Indiana numerators and to include some additional data for Michigan previously excluded. October 2001 was restated in March 2002 to include data received after the initial posting and to correct the retail data.

148. **Data Inclusion and Disaggregation Errors** (AIT PM17) – April and May 2001 were restated in August 2001 to properly reflect data previously omitted. During 2001, no data were reported for the "Additions" level of disaggregation.

149. **Programming Error** (AIT PM 18) – Due to incorrect programming, January through March 2001 results included CABS data submitted electronically through VAN in the numerator only. For the evaluation period, the stop time reported was the time the bill was available as opposed to the transmission time.

150. **System Implementation and Interface Problem** (AIT PM 19) – April through June 2001 were restated in August 2001 to include the new interfaces (Web LEX, EDI LSOG 4, EDI VAN, EDI SSL3, AEMS LSOG 4, Web Verigate, Web Toolbar, ARAF, EDI Pre-Order, CORBA Pre-order) implemented with the March 24, 2001 system release. Additionally, May through November 2001 was restated in March 2002 to add another interface. September 2001 was restated in December 2001 to correct prior results in error due to a Web LEX problem.

151. **File Transmittal Error** (Various AIT PMs) – The file containing January 2001 results sent to the FCC staff on February 20, 2001 was a preliminary file. A second complete file was provided to the Staff the next day. January 2001 results posted to the web site were accurate and filed on time.